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To: MHDS Commission Members & DHS Staff
From: Flora A. Schmidt, Executive Director
Date: September 13, 2021
Re: CMHC Interim Designation Consideration

On behalf of the Iowa Behavioral Health Association and our 13 member CMHCs, we are concerned with the agenda item on the September 16, 2021 MHDS Commission agenda: *Request for Interim CMHC Designation - Optima LifeServices.

At the March 18, 2021 Commission meeting as noted in the minutes:

Rich Whitaker motioned to adopt rules to outline appropriate processes, in accordance of 230A, for designation of CMHCs and to table the approval decision regarding Optima's designation with regards to Lee, Jefferson and Des Moines counties until these rules are implemented. Betsy Akin seconded. There were comments by Commission members regarding the need for clarity with regards to this process and that when the Commission comes up with rules that they look at a process to engage providers to cover the eleven counties that do not have a CMHC designated. Motion passed unanimously.

As Optima LifeServices is the non-CMHC contracted agency for Des Moines, Jefferson and Lee Counties, the need for an interim designation does not seem warranted and to consider an "interim" designation appears as an attempt to circumvent the rule making process that is in progress.

IBHA strongly encourages the Commission to not approve the request for interim designation and to wait until the CMHC designation process rules are implemented.

Thank you for your time and consideration.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Flora A. Schmidt', is written over a faint, stylized blue line graphic.

Flora A. Schmidt, Executive Director
Iowa Behavioral Health Association

IBHA is the leading voice for nonprofit licensed/accredited organizations that treat mental health disorders, substance use disorders, and gambling disorders, to enhance their effectiveness and resiliency through advocacy and knowledge sharing representing 29 agencies across Iowa. A listing of member locations as well as programs and services offered is available at: <https://www.ibha.org/wp-content/uploads/2012/09/IBHA-Agency-Programs-Services-Locations-6.2021.pdf>